

## **Tab 5**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

VALERIE W. WAKEFIELD : Civil Division  
Plaintiff, :  
: Civil Action  
: No. 05 CV 79 - Erie

VS.

JOY MINING MACHINERY :  
COMPANY, a division of :  
Harnischfeger Industries :  
Defendant. : Honorable Maurice B. Cohill, Jr.

Deposition of : CORNELIA ADAMS

Date : September 21, 2006  
commenced at 11:20 a.m.

Place : Franklin Club  
1341 Liberty Street  
Franklin, PA

APPEARANCES:

FOR THE PLAINTIFF:

ALEXANDER H. LINDSAY, JR., ESQ.  
The Lindsay Law Firm, P.C.  
128 South Main Street  
Butler, PA 16001

FOR THE DEFENDANT:

PAMELA G. COCHENOUR, ESQ.  
Pietragallo, Bosick & Gordon  
The Thirty-eighth Floor  
One Oxford Centre  
Pittsburgh, PA 15219

1 A. In the union.

2 Q. Okay. That's just the union employees that you  
3 deal with?

4 A. Yes. Yes.

5 Q. Okay. Is there only one union?

6 A. No. There's actually two unions, but one is an  
7 office union and I do not deal with them. I deal  
8 with the IAM.

9 Q. Okay. I'd like to call your attention to, I  
10 guess it would be June of 2003. Do you recall a  
11 meeting of sorts or a get together, so to speak,  
12 with Valerie Wakefield where she was in an  
13 emotional state?

14 A. Yes.

15 Q. Okay. And you recall that the name of Larry  
16 Meade came up in that conversation?

17 A. Yes.

18 Q. Okay. Now, before that time had you ever had any  
19 discussion with Valerie Wakefield about Larry  
20 Meade?

21 A. No.

22 Q. Okay. Tell us in your own words, if you would,  
23 what happened that day?

24 A. Well, I was sitting at my desk and behind my work  
25 area there is an open space and then at that time

1 Valerie need you, if you know?

2 A. Because I lost a son in 1992.

3 Q. All right.

4 A. And when her stepson was, when he died, I offered  
5 her help and support.

6 Q. Okay.

7 A. And everybody pretty much knew that.

8 Q. Okay. All right. Going back to, you say that  
9 Johan left?

10 A. Yes. He left the office.

11 Q. What happened then?

12 A. Valerie and I talked about her state, why she was  
13 so upset.

14 Q. And what did she tell you?

15 A. She told me that Larry had gone to her house and  
16 wanted to, wanted to have sex with her and she  
17 had told him no.

18

19 MS. COCHENOUR: For purposes of  
20 clarifying the record, Mr. Lindsay, you  
21 began your questioning of this witness  
22 relative to an incident in June of 2003?

23 MR. LINDSAY: Yes.

24 MS. COCHENOUR: Correct?

25 MR. LINDSAY: Yes.

1 A. Actually I didn't remember what was in here.

2 Q. Okay. That's all right. The, "You're playing  
3 with fire statement," do you remember her saying  
4 that to you?

5 A. No, I don't.

6 Q. Okay. I think we've already established you  
7 never discussed Larry Meade with Valerie in any  
8 way, shape, manner, or form prior to the date  
9 we're talking about here; is that correct?

10 A. Yes.

11

12 MS. COCHENOUR: I still want to  
13 clarify for the record, Mr. Lindsay, as I  
14 mentioned earlier you began your questioning  
15 asking the witness whether or not she was  
16 present at, I think you used the word  
17 incident involving Valerie Wakefield when  
18 she was upset --

19 MR. LINDSAY: Yes.

20 MS. COCHENOUR: -- on June 3rd,  
21 2003?

22 MR. LINDSAY: I just said June, but  
23 June 3rd will do.

24 MS. COCHENOUR: Okay. June of  
25 2003?

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S I G N A T U R E

*Cornelia R Adams*  
NAME

*11/2/06*  
DATE